Considering changes to light vehicle inspections

Discussion document

NZ Transport Agency Waka Kotahi

29 October 2025

NZ TRANSPORT AGENCY WAKA KOTAHI

Te Kāwanatanga o Aotearoa
New Zealand Government

More information

NZ Transport Agency Waka Kotahi

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This document is available on NZTA's website at

Consultation Hub

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Purpose of consultation

The changes to light vehicle inspections being discussed in this document would require changing the Land Transport Rule: Vehicle Standards and Compliance 2002.

Rules are made by Ministers of Transport under the Land Transport Act 1998 (the Act). They contain detailed legal requirements, such as standards and processes.

We're looking at how vehicle inspections work in New Zealand. Our goal is to keep people safe on the road, while making these inspections less burdensome and more affordable for everyone. We want to understand if there is public support for the changes being proposed. We also want to understand what the expected costs and benefits would be, and what issues might come up if light vehicle inspection requirements were changed.

We'll consider and analyse the feedback we receive and use it to provide advice to the Associate Minister of Transport. The Associate Minister will then decide whether to make any Rule changes using the Order in Council process. Information about how to provide feedback on this consultation can be found in the Making a submission section of this document.

Information on the Order in Council process can be found on the Department of the Prime Minister and Cabinet's website.

The Executive Council Role in the regulations process

Scope of consultation

This review is only about warrant of fitness (WoF) and certificate of fitness A (CoF A) for light vehicles. It doesn't cover:

- Annual vehicle licensing (commonly known as 'rego')
- Driver licensing
- Heavy vehicle inspections (known as 'certificate of fitness B')

We have reviewed whether the current set of vehicle components looked at during WoF and CoF A by inspectors should continue to be assessed. We didn't assess pass/fail thresholds or 'tolerance levels' for each of those components (such as minimum tread depth for tyres).

While both WoF and CoF A inspections aim to ensure vehicle safety and roadworthiness, we're not proposing CoF A vehicles switch into the WoF system. CoF A inspections are designed for commercial or passenger service vehicles, which are generally used more often than private vehicles. Maintaining both regimes should keep inspection requirements proportionate to vehicle type and use, without placing undue burden on standard WoF providers.

What we're seeking feedback on

We're seeking your views on the proposed changes to our WoF and CoF A vehicle inspection systems set out in this document.

When you provide your feedback, please consider:

- What impact would the proposals have, and on who? We're particularly interested in your comments on any costs to you or your organisation.
- Would any groups or individuals be disadvantaged by the proposals, and how?
- Would any groups or individuals benefit from the proposals, and how?
- Are there any other implementation or compliance issues we need to consider?

Wherever possible, please provide examples to illustrate your point.

We suggest you submit your feedback by completing our full survey questionnaire:

Considering changes to light vehicle inspections

You can find a full list of the survey questions in appendix 1.

Appendix 1

Want more detail?

This document provides a summary of the proposed changes to our WoF and CoF A vehicle inspection systems. If you'd like an in-depth analysis of the work carried out for this review, read the interim Regulatory Impact Statement (interim RIS).

Land Transport Rules Reform Programme

Summary

We have developed a preferred package of changes to our WoF and CoF A vehicle inspection systems (the package). We think this package will be the most effective way to improve New Zealand's current vehicle inspection systems. It focuses on matching vehicle safety risk to how often inspections happen, what they cover, and how well they're supported by other safety tools.

This package should also encourage and enable vehicle owners to take more personal responsibility for their vehicle's safety and in the process reduce the costs of running and owning a vehicle.

At the centre of this package are proposed changes to inspection frequency. For private light vehicles we propose reducing how often most vehicles under 10 years of age and those between 25 and 40 years old require safety inspections. We're also proposing rental commercial passenger vehicles less than 5 years old undergo a CoF A inspection annually rather than every 6 months.

Our analysis shows reducing inspection frequency for these vehicles is likely to have a relatively minor impact on safety outcomes but potentially save vehicle owners between $1.2 billion and $1.9 billion over the next 30 years.

To minimise the risk of negative safety outcomes, we propose to expand vehicle inspection scope and encourage people to take more of an active role in the upkeep of their vehicles through education and enforcement.

Package summary

<table>
<tr><th></th><th>WoF</th><th>CoF A</th></tr>
<tr><td rowspan="2">Inspection frequency</td><td>Extend period between first and second WoF for new vehicles from 3 to 4 years.</td><td rowspan="2">Introduce 12-month default inspection frequency for all light rental service vehicles under 5 years of age.</td></tr>
<tr><td>Two-year inspection frequency for vehicles between 4 and 10 years old and annual inspection frequency for vehicles older than 10 years.</td></tr>
<tr><td>Inspection scope</td><td colspan="2">Introduce requirement for certain Advanced Driver Assistance Systems features to be working if fitted.</td></tr>
<tr><td rowspan="3">Enforcement and education</td><td colspan="2">Consider raising the current fines and introducing demerit points for:
driving or parking a vehicle in a public place without a valid WoF/CoF A
vehicle condition offences (such as having bald or damaged tyres)</td></tr>
<tr><td colspan="2">Work with local councils on increasing the frequency and consistency of local council enforcement, for example parking wardens.</td></tr>
<tr><td colspan="2">Increase public education to encourage ongoing vehicle checks and maintenance between inspections.</td></tr>
</table>

Why we're reviewing WoF and CoF A

New Zealand checks vehicles more often than most other countries, but this frequency doesn't always lead to better safety outcomes. At the same time, many vehicles are getting older and newer vehicles are becoming more complex.

The Government Policy Statement on land transport 2024 includes a commitment to review the vehicle regulatory system. The review aims to (among other objectives):

- enable better management of vehicle safety performance
- reduce unnecessary regulatory burden
- keep our Land Transport Rules (Rules) up to date and fit for purpose

The Government's Road Safety Objectives include an action for the NZ Transport Agency Waka Kotahi (NZTA) and the Ministry of Transport (the Ministry) to review our vehicle inspection systems. The goal is to ensure inspections:

- target risk effectively and efficiently
- focus on the most important risks
- suit the vehicles being inspected

This work is also part of the Government's Land Transport Rules Reform Programme, and you can read more about this package of reforms here:

Land Transport Rules Reform Programme

How we developed and assessed options

In considering changes to light vehicle inspections, we sought stakeholder feedback, investigated what other jurisdictions do, and analysed data sources.

This work, alongside the strategic objectives outlined earlier, identified 3 light vehicle inspection components where changes could be made to maintain safety and remove unnecessary costs:

1. **Inspection frequency:** changes to how often vehicles are inspected to more fairly link inspection costs to vehicle condition risk.
2. **Inspection scope:** changes to what gets checked in inspections to account for safety. This includes critical/safety-influencing technologies not currently allowed for under current settings.
3. **Enforcement and education:** changes to increase vehicle condition-related enforcement and related public education/awareness campaigns.

We developed 25 options across these 3 components. Each option was assessed against the criteria in the interim RIS table below in terms of strengths and weaknesses. This discussion document summarises our assessment of each of the package options against these criteria. Detail about the other options (those not in the package) can be found in the interim RIS on the Ministry of Transport website:

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Option assessment criteria

Criteria	Description
Improves safety outcomes	The likely effect on road safety outcomes, including the detection and deterrence of unroadworthy vehicles.
Reduces compliance cost	The likely cost and burden for regulated parties (such as time, fees, administrative effort).
Ease of implementation	How easy it is to roll out, administrative demands, and long-term sustainability of the system.
Delivers fair and equitable social outcomes	The likely distribution of impacts across different groups of people and regions, including access, affordability, and unintended consequences for vulnerable users.

We also used an economic cost-benefit analysis to estimate the potential impacts of the proposed WoF frequency changes. To determine these estimates, we used data from the Motor Vehicle Register for vehicle details and the Crash Analysis System for crash details.

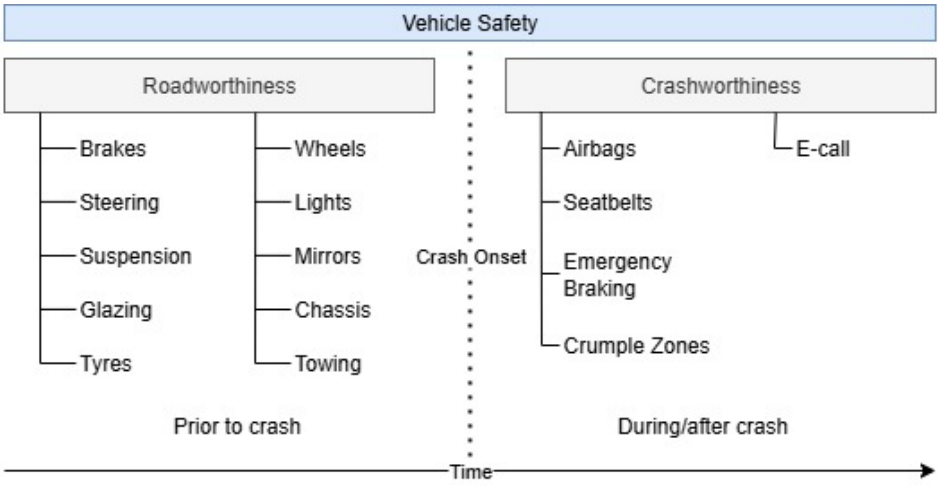
We didn't apply the cost-benefit analysis method to the proposed changes to CoF A inspection frequency because crash numbers and vehicle faults involving CoF A-eligible vehicles are very low. We also couldn't apply it to the inspection scope and enforcement and education components because these rely more on qualitative than quantitative judgements.

Roadworthiness and light vehicle inspections

Keeping vehicles safe to drive starts with making sure they're in good working condition. This is called roadworthiness. Roadworthiness means things like brakes, tyres, lights, and steering are working properly to help prevent crashes.

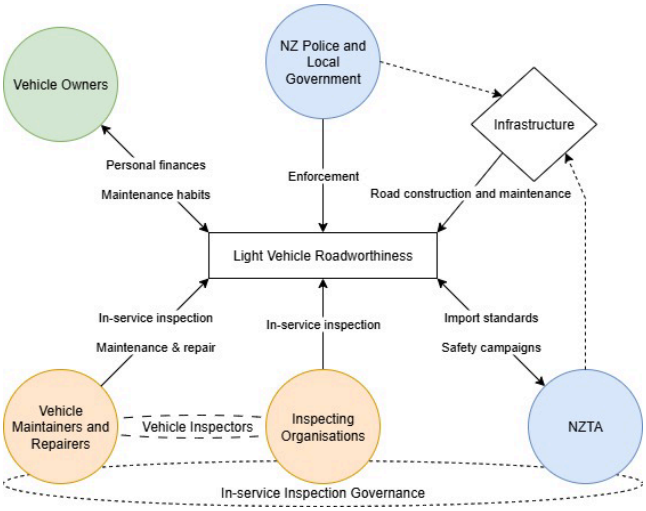
There's also crashworthiness – how well a vehicle protects people in a crash – including features like airbags, seatbelts, and crumple zones. Together, roadworthiness and crashworthiness help reduce both the chance of a crash and the harm it causes. The key features of roadworthiness and crashworthiness are highlighted in figure 1 below.

Figure 1: Pillars of vehicle safety: roadworthiness and crashworthiness



Roadworthiness is also about a vehicle being able to interact safely with the wider transport system. How roads are built, how easy it is to get repairs done, the age of the vehicle, how well it's maintained, and a driver's behaviour all play a part. The relationship between the elements impacting roadworthiness is illustrated below in figure 2.

Figure 2: Roadworthiness and the New Zealand transport system



The role of vehicle inspections

Inspections are an important part of roadworthiness. Inspections can catch mechanical problems with the potential to make a vehicle unsafe and cause harm, like worn tyres or faulty brakes. While most crashes are linked to speeding or drunk driving, vehicle faults, though less common, can still contribute to serious or fatal crashes.

Regular vehicle inspections can encourage people to fix issues early and take better care of their vehicles. These inspections can help reduce risks and keep everyone safer on the road. Second-hand car buyers are also more likely to buy vehicles that passed basic safety checks.

New Zealand's current light vehicle inspection system

New Zealand's light vehicle inspections are built around 2 core systems: the WoF and CoF A checks. Most people know about the WoF as it's used to regularly check privately-owned light vehicles. The CoF A is for light vehicles carrying passengers, such as taxis, rideshare vehicles, and rental cars. Both systems involve regular inspections to make sure vehicles meet minimum safety standards before they're allowed on the road.

To be classified as a light vehicle, a vehicle must weigh less than 3.5 tonnes. There are approximately 4.5 million light vehicles in New Zealand needing WoF inspections (not including trailers). Each year, more than 6 million WoF inspections are carried out by approximately 3,000 inspection sites, including local mechanics and specialist testing centres.

CoF A inspections are required for approximately 80,000 light vehicles in New Zealand. Vehicles requiring CoF A are used for commercial passenger transportation. They're generally used more often than private light vehicles and must meet a higher standard to pass inspection. CoF A inspections must be carried out at one of 276 independent testing stations.

The lower number of CoF A sites reflects the more specialised equipment and facilities required—such as brake rollers and load simulation gear— not typically available at standard WoF garages. CoF A inspections also require inspectors trained to assess commercial and passenger service vehicles under stricter safety criteria.

Unique challenges for vehicle safety in New Zealand

Several environmental, economic, and cultural factors separate New Zealand's vehicle landscape from countries we typically compare ourselves to. While other jurisdictions provide useful comparisons, we have always kept New Zealand's unique circumstances in mind when assessing potential changes and selecting our package, including:

- the average age of our light vehicles is higher than most other countries (more below)
- the nature of our roads can be different because of our difficult terrain
- our culture of vehicle 'self-assessment' is relatively less developed.

Average age – The age of a vehicle on the road can affect how safe and reliable it is. In New Zealand, the average light vehicle age is 15 years[1]. This contrasts with other comparable countries we studied where average vehicle age is closer to 10 years. Australia had the second oldest average vehicle age at 10-12 years old. This is important from an inspection perspective because older cars break down more often and usually don't have the latest safety features, which can make them less safe.

Further detail on international comparisons is included in Annex 1 of the interim RIS.

[1] Vehicle age is usually calculated from date of first registration, not date of manufacture. This means a vehicle manufactured in one year but registered later will have its age counted from registration date. Imported used vehicle ages may be the original overseas registration date, not the New Zealand registration date. How vehicle age is calculated affects inspection requirements, depreciation, eligibility for certain exemptions or schemes, and how we interpret fleet age trends and safety risks.

The role of personal responsibility

Many people rely on WoF and CoF A inspections to provide confidence their vehicle is safe. However, these inspections only assess a vehicle's condition at a single point in time. Drivers interact with their vehicles far more frequently than inspectors do, and both drivers and people with vehicles registered in their names are legally responsible for ensuring these vehicles are safe to operate at all times.

We know some issues, like worn tyres or broken wiper blades, can be spotted without needing the qualifications held by a vehicle mechanic or vehicle inspector. As part of our review, we have been conscious that encouraging people to take more personal responsibility for the condition of their vehicles could both reduce compliance costs and improve road safety outcomes.

Vehicle inspection frequency

WOF and CoF A inspections play a key role in helping keep New Zealand's roads safe. These regular checks help ensure vehicles meet basic safety standards — from brakes and tyres to lights and structural integrity. We have assessed New Zealand crash and inspection data and reviewed practices internationally to determine whether our frequency settings effectively match our vehicle fleet's safety risks.

We assessed 7 possible changes to WoF frequency and three to CoF A frequency. A detailed analysis of each of these, including the reasons some of them were discounted, is available in the interim RIS.

The rest of this section focuses on the rationale for, and impacts of, our preferred package of options relating to inspection frequency.

WoF inspections

Why should we change?

Over the years, the number of Death and Serious Injury (DSI) crashes caused by vehicle defects has gone down. This may be due to better vehicle design, improved maintenance, and regular inspections.

However, it's possible some defects aren't always reported or investigated properly. This is shown in figure 1 below. In 2023, a vehicle defect was recorded as a contributing factor in 1.7% of DSI crashes.

Another pattern is also clear in Figure 2 below. Cars over 15 years old show higher risk, as they're more likely to be involved in DSI crashes where a vehicle defect is a contributing factor.

Figure 1: Percentage of light vehicles with defects in DSI crashes by crash year (2004-2023)

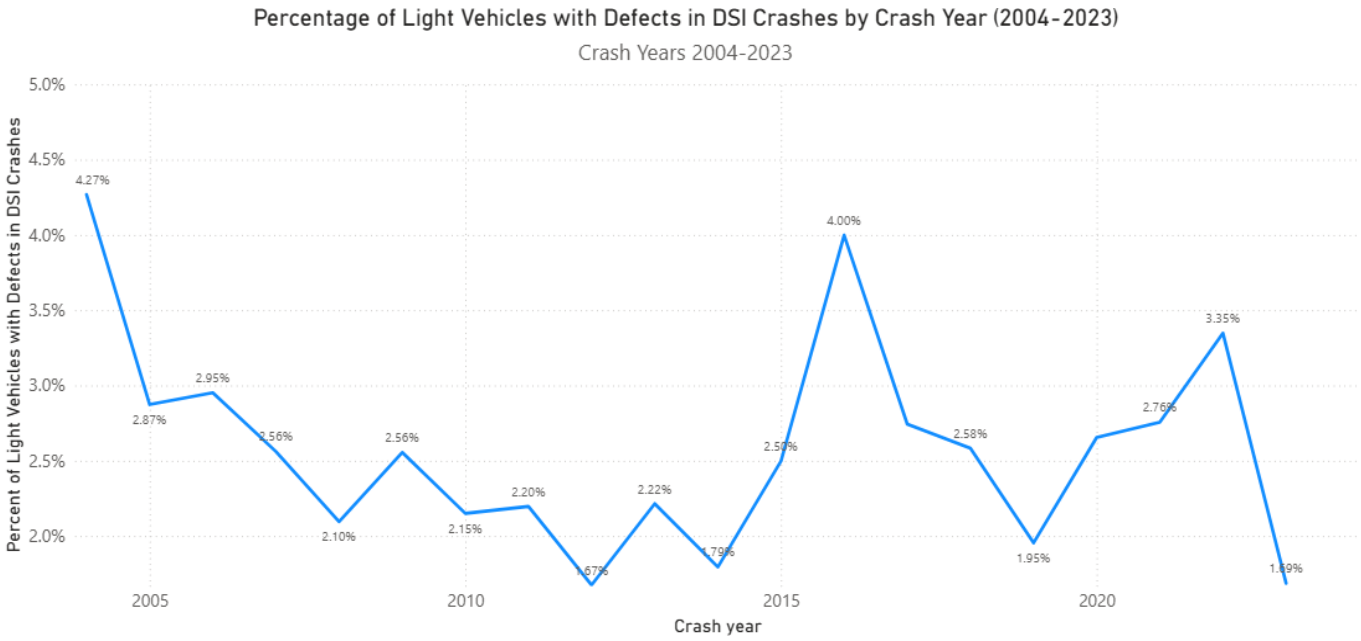
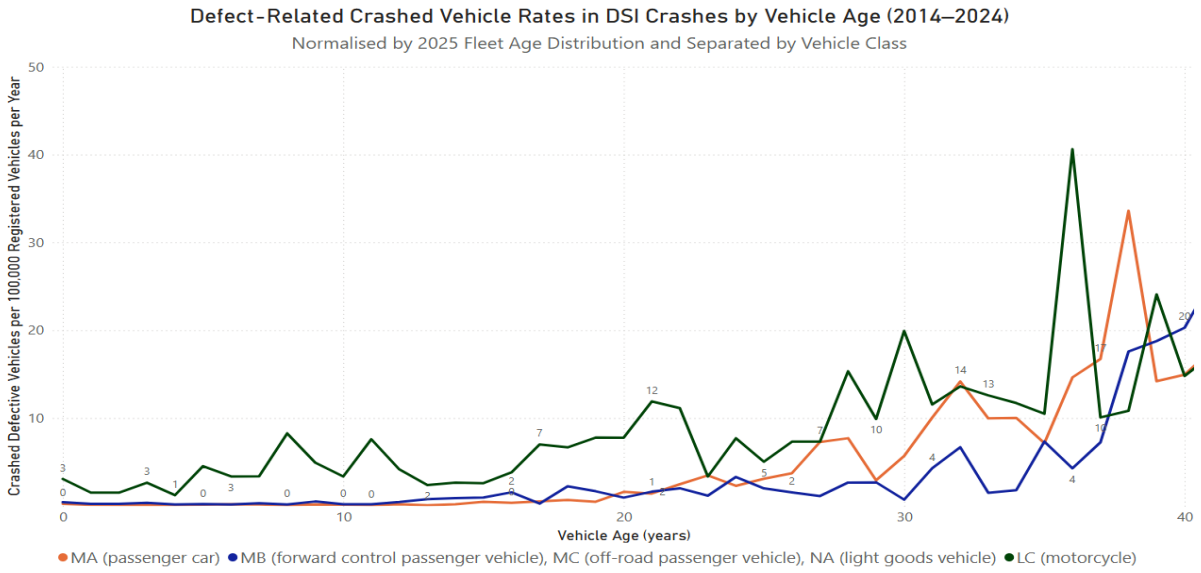


Figure 2: Defective crashed vehicle rates in DSI crashes by vehicle age and fleet distribution (2014-2024)



What can we learn from other countries?

New Zealand checks vehicles more often than most other countries. Most cars in New Zealand need a WoF every 6 to 12 months, depending on their age. We assessed a range of other comparable countries and Australian states. The inspection frequency of each is provided in Table 1 below.

Key findings:

- the most common approach is to inspect light vehicles under 10 years old every 2 years
- most Australian states either have no mandatory safety inspections or only require one when a vehicle is sold.
- even with fewer inspections, these countries generally have better overall vehicle safety outcomes than New Zealand.

It's important to highlight these jurisdictions often also have a broader suite of supporting actions and interventions, such as targeted enforcement, education campaigns, or technology-driven compliance measures, to assist in achieving vehicle safety outcomes.

Table 1: WoF inspection frequency in other jurisdictions

Country/ Jurisdiction	Inspection frequency	Vehicle defects in DSI crashes (%)	Fleet light vehicle average age (years)
New Zealand	Every 6–12 months depending on vehicle age.	2–3%	15
Australia – NSW	Annual for vehicles >5 years.	2–3%	10-11
Australia – VIC, QLD, SA, WA, TAS	Mix of no periodic inspections; inspections required at sale, transfer, or defect notice.	2–3%	10-12
Ireland	First at 4 years, then every 2 years until 10 years, then annual.	Less than 2%	10
United Kingdom	Annual for vehicles >3 years.	Less than 2%	8.6

Country/ Jurisdiction	Inspection frequency	Vehicle defects in DSI crashes (%)	Fleet light vehicle average age (years)
Japan	First at 3 years, then every 2 years.	1–2%	10-13
Germany	First at 3 years, then every 2 years.	Less than 1%	9.5
Sweden	First at 3 years, then 2 years, then annual.	Not specified, presumed low	10.3
Norway	First at 4 years, then every 2 years until 8 years, then annual.	Not specified, presumed low	10.7

Proposed WoF frequency changes

For WoF vehicles, the proposals are:

- extend period between first and second WoF for new vehicles from 3 to 4 years
- introducing a risk-tiered frequency model based on vehicle age, inspecting vehicles:
  - over 4 years and under 10 years, every 2 years
  - over 10 years, annually.

These proposals were selected for their ability to deliver significant cost savings while keeping safety risks manageable, especially when paired with complementary measures such as improved enforcement and public education. Table 2 below summarises these changes and shows how many vehicles would likely be affected by each proposed change.

Table 2: **Proposed WoF inspection frequency changes by vehicle age**

Vehicle age	Current inspection frequency	Proposed inspection frequency	Possible number and % of light vehicles effected (approximate)
From first WoF date up to 4 years from that date.	Second inspection 3 years after initial WoF inspection.	Second inspection 4 years after initial WoF inspection.	539,000 vehicles total (12%) • 376,000 less than 4 years old (8%) • 162,000 between 3 and 4 years old (4%)
From 4 years since first registration date up to 10 years.	Annual	Every 2 years	1,026,000 vehicles (23%)
From 10 years since first registration date up to 25 years.	Annual	No change	2,435,000 vehicles (54%)
From 25 years since first registration date up to 40 years.	Every 6 months	Annual	374,000 vehicles (8%)
More than 40 years since first registration date (classified as veteran and vintage vehicles).	Annual	No change	162,000 vehicles (4%)

What impacts could these proposed changes have?

As part of our review, we carried out a cost-benefit analysis to estimate the potential impacts of the WoF frequency changes we are proposing. We used data from the Motor Vehicle Register which tracks vehicles and the Crash Analysis System, which records crash details. The cost-benefit analysis considered 3 main possible main effects of each WoF frequency change:

- safety risks (in particular, how many DSI crashes could occur as a result)

- savings for drivers (such as paying for fewer inspections and repairs and time savings from fewer inspections)
- costs to inspection businesses and mechanics (such as reduced inspections and revenues and possible employee loss)

For more detail on how these costs and benefits were modelled and their limitations, you can read the cost-benefit analysis on the Ministry of Transport website.

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The cost-benefit analysis provided more detail for our key assessment criteria and is combined in Table 3 below with an additional row for 'projected industry impacts'.

Table 3: Key criteria and cost-benefit analysis assessment for proposed WoF frequency changes

Criteria	Extend period between first and second WoF for new vehicles from 3 to 4 years	Two-year inspection frequency for vehicles over 4 and less than 10 years old	Annual inspections for vehicles 25-40 years old
Safety impact over the period 2027-2055 (if no other changes were introduced)	Fatal crashes: 1 to 2 over the period 2027-55. Serious crashes: 4 to 14 over the period 2027-55. Minor crashes: 18 to 74 over the period 2027-55.	Fatal crashes: 3 to 8 over the period 2027-55. Serious crashes: 17 to 52 over the period 2027-55. Minor crashes:102 to 313 over the period 2027-55.	Fatal crashes: 0 to 1 over the period 2027-55. Serious crashes: 0 to 3 over the period 2027-55. Minor crashes: 2 to 16 over the period 2027-55.
Compliance cost savings (over the period 2027-2055)	$184m to $264m over the period 2027-55.	$1.2b to $1.9b over the period 2027-55.	$279m to $433m over the period 2027-55.
Ease of implementation	Changes required for implementation are minor and do not introduce significant complexity.	Changes required for implementation are minor and do not introduce significant complexity.	Changes required for implementation are minor and do not introduce significant complexity.
Projected impacts on the light vehicle inspection industry	Inspection reduction: 3% over the period 2027-55. Revenue reduction: $9m-$10m per annum. FTE reduction: 68-73 (1% of registered Vehicle Inspectors) over the period 2027-55.	Inspection reduction: 15% over the period 2027-55. Revenue reduction: $42m-$49m per annum. FTE reduction: 327-350 (4% of registered Vehicle Inspectors) over the period 2027-55.	Inspection reduction: 12% over the period 2027-55. Revenue reduction: $31m-$37m per annum. FTE reduction: 247-264 (3% of registered Vehicle Inspectors) over the period 2027-55.

Other options considered

Other options considered included:

- extending the period between the first and second WoFs for new vehicles to 5 years
- introducing distance-based inspection intervals
- implementing variable frequency based on maintenance history.

While these options offered potential cost savings, they were found to have significant implementation challenges, equity concerns, or risks of perverse incentives. For example, distance-based inspections would require major system upgrades in advance of Road User Charge changes for petrol light vehicles

and pose the risk of odometer fraud. Maintenance-history-based models could disadvantage low-income owners and create pressure on inspectors.

It's important to note we think distance-based inspections are a sensible option to consider once all light vehicles have transitioned to Road User Charges. While wear and degradation of vehicle components are bought about by vehicle travel, it is more sensible to consider distance-related options when we can more accurately measure distances travelled.

We're keen to hear your views about these proposed changes

We want to hear your views about setting the transition point between 2 yearly and annual inspections at 10 years. Our analysis shows vehicle safety risks start to rise more noticeably around the fifteen-year mark, but this would increase safety risks.

We also want to know if you think the proposed increase to the period between the first and second WoF for new vehicles from 3 to 4 years is right. Newer vehicles are generally safer and less likely to have problems, and this change would bring New Zealand in line with practices in some other countries. The same reasoning could support a move to five years, which would benefit more vehicle owners. However, waiting 5 years before the second inspection would carry a higher overall safety risk than our proposed 4 year option.

CoF A inspections

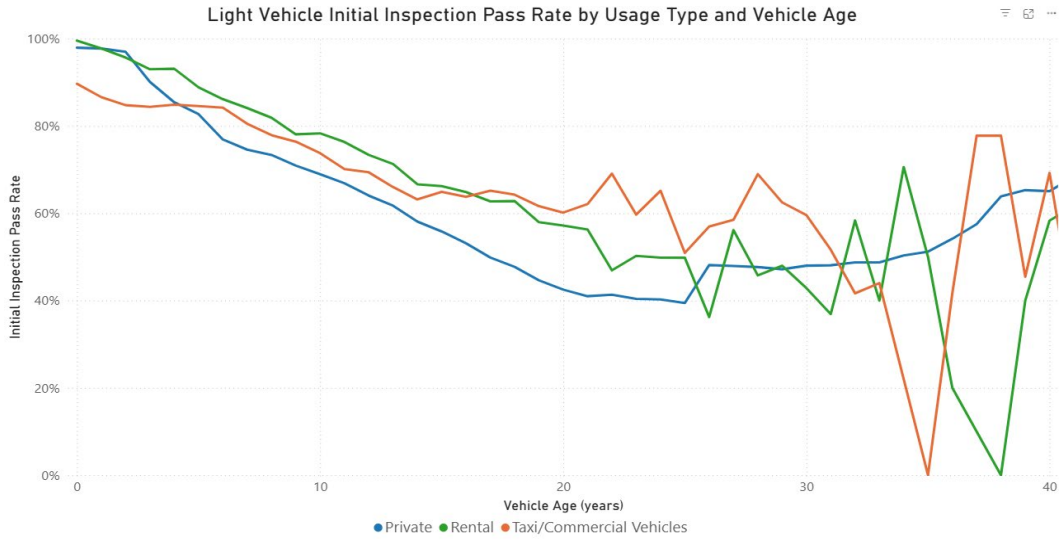
Why should we change?

Rental, taxi, and rideshare light vehicles are generally newer, well maintained, and present a lower safety risk than private vehicles. Figure 3 below shows the relative inspection pass rates for all light vehicles separated into private and rental and taxi/commercial (which includes rideshare) categories. Rental and taxi/commercial vehicles have higher pass rates than private vehicles even though they are subjected to a more rigorous test more often.

However, there is an important distinction within the CoF A category. Rental vehicles are typically newer than taxi or rideshare vehicles. Many of the major rental fleet operators only operate vehicles up to 1-2 years old before selling them into the private market. Taxis and rideshare vehicles, however, are often several years old. Also, rideshare vehicles (and some taxis) are often single operators. So, while their standard of maintenance is often higher than privately owned vehicles, they are not subject to the standardised and rigorous maintenance processes of large rental companies.

These results align with the strong commercial incentives rental, taxi and rideshare operators have to keep their vehicles in a good and safe operating condition.

Figure 3: Light vehicle initial inspection pass rate by usage and age



What can we learn from other countries?

Our study of systems in other countries confirmed our requirements for rentals, taxis and rideshare light vehicles are consistent with international practice. Our key findings were:

- Rental, taxi and rideshare vehicles require more frequent inspection than private vehicles in most of the countries we studied.
- Rental, taxi and rideshare are inspected to a higher standard than private vehicles in most other countries we studied.

New Zealand's required frequency of 6 months is more regular than most of the jurisdictions we studied. While South Australia also set its frequency at 6 months, Japan, Ireland, Sweden and New South Wales require rental, taxi and rideshare vehicles to undergo inspection annually. The most frequent requirement was in the United Kingdom where taxi inspections can be carried out every 3 months depending on locality. For more detail on the frequency of inspections in other jurisdictions, refer to Annex 1 of the interim RIS.

Proposed CoF A inspection frequency changes

For rental vehicles under 5 years old, we propose changing the CoF A inspection frequency from every 6 months to once a year. These vehicles are generally newer, well maintained, and present a lower safety risk than other CoF A vehicle types. This change would help reduce compliance costs for rental companies while maintaining safety standards.

This would become the default inspection frequency for rental vehicles as most rental companies do not operate vehicles older than 5 years. The Director of Land Transport would still be able to vary CoF A inspection intervals between 3 and 12 months based on a rental company operator's safety performance, as allowed under the Land Transport Rule: Vehicle Standards Compliance 2002.

Table 4: Possible impacts of proposed CoF-A frequency changes by vehicle age

Vehicle age	Current CoF A frequency	Proposed CoF A frequency	Likely number and % of vehicles effected (approximately)
Rental vehicles up to 5 years old since first registration.	Every 6 months (default)	Every year (default)	36,000 vehicles (45%)
Rental vehicles older than 5 years.	Every 6 months	No change	24,000 vehicles 30% of fleet CoF A eligible vehicles
Taxis and rideshare vehicles of any age	Every 6 months	No change	23,000 vehicles 29% of fleet CoF A eligible vehicles

What impacts could these proposed changes have?

The key criteria assessment for these options is provided in Table 5 below. On balance we think these changes would be well targeted, proportionate and balance cost savings with safety assurance. By focusing on rental vehicles under five years old, the proposal captures a low-risk segment of the fleet while maintaining more frequent inspections for vehicles such as taxis and rideshare light vehicles.

Please note we were unable to carry out a cost benefit analysis of the CoF A frequency change options. This is because of the low volume of CoF A vehicle crashes where vehicle defects were listed as a contributing factor. Only one crash of this type has been recorded since 2014.

Table 5: Key assessment criteria for proposed CoF A frequency changes

Criteria	Assessment
Safety outcomes	We consider additional risk of crashes compared to current requirements to be very low. Rental vehicles receive regular maintenance due to other factors such as commercial incentives. Only one CoF A crash vehicle has listed a vehicle fault as a contributing factor since 2014.
Compliance cost savings	Businesses operating rental vehicles under 5 years old will save money due to less inspections being required. Major rental companies very rarely operate vehicles older than 5 years.
Ease of implementation	Changes required for implementation are relatively minor and do not introduce significant complexity for the government or CoF A vehicle businesses.
Fairness across different socio-economic groups	The overall level of fairness across the system will not change materially.

Other options considered

Three CoF A frequency options were assessed. Other options considered included extending the 12-month interval to all CoF A vehicles under five years old and introducing distance-based inspections.

While moving both rental and taxi/rideshare vehicles under five years to 12-month intervals offered broader cost savings, it was rejected due to concerns taxis and rideshare light vehicles may not be as consistently maintained or as young as rental vehicles. Distance based inspection was also rejected for the same reasons outlined in the WoF frequency section of this document.

Vehicle inspection scope

WoF and CoF A inspections are designed to check a wide range of car and light commercial vehicle parts. These checks include systems like brakes, tyres, lights, steering, suspension, seatbelts and structural elements like rust and windscreen condition.

We assessed New Zealand crash and inspection data and reviewed international practices to form views on whether our current vehicle inspection scope is fit for purpose. We want to be confident our vehicle inspections cover all relevant risks and avoid components not critical to vehicle and road safety.

As part of our review we assessed three different possible changes to the scopes of both WoF and CoF A. A detailed analysis of each of these, including the reasons some of them were discounted, is available in the interim RIS.

The rest of this section focuses on the cases for vehicle inspection scope change and the rationale for our preferred changes.

Why should we change?

The current light vehicle inspection checklist for both WoF and CoF A hasn't changed much in recent years. This is despite vehicles now including technologies capable of controlling/guiding a vehicle in place of, or alongside, a driver. These technologies are generally grouped under the umbrella term 'Advanced Driver Assistance Systems'. Examples of Advanced Driver Assistance Systems features include things like Automatic Emergency Braking[2] and Lane Keep Support Systems[3].

There is currently no requirement or ability for a WoF or CoF A inspection to cover these features. This is despite these systems performing similar functions to traditional mechanical components we can check, like braking, steering, and visibility. These features have been added to most new vehicles manufactured over the past 10 years. Estimates suggest approximately one million light vehicles in the New Zealand fleet are fitted with some form of Advanced Driver Assistance System features.

WoF and CoF A inspection scopes

We assessed the necessity and value of each component of the current WoF and CoF A inspections, summarised in Table 6 below. We found no compelling safety or compliance reason to remove any of them, as each plays an important role in maintaining vehicle safety. All items currently inspected are consistent with those checked in other jurisdictions operating similar mandatory inspection regimes, as highlighted in Annex 1 of the interim RIS.

During initial consultation, no industry feedback was received to suggest the removal of any items currently inspected, or lowering of any pass/fail thresholds in both inspection regimes. These results indicate current inspection scopes are well aligned with best practice and continue to meet safety expectations without imposing unnecessary regulatory burden.

Table 6: WoF and CoF A inspection content

Component	WoF inspection content	CoF A additional inspection content
Tyres, wheels and hubs	Tyre and wheel type, placement, condition, compatibility Hub and axle condition and performance. Mudguard fitment and condition	
Brakes	Service and parking brake system condition and performance	A higher standard of test equipment is required (e.g. roller brake machine)
Lighting	Lighting system and lamp condition and performance	Additional inspection of passenger service vehicle interior lighting

[2] Automatic Emergency Braking operates by automatically applying brakes if an imminent collision with another vehicle, pedestrian, or obstacle is detected and the driver has not responded in time.
[3] Lane Keep Assist can help prevent unintentional lane departures by using cameras to monitor road markings. This system can gently steer a vehicle back into its lane if it begins to drift.

Component	WoF inspection content	CoF A additional inspection content
Steering and suspension	Steering and suspension system condition and performance	More detailed check for excessive body sway and suspension safeguards. Note left-hand drive steering is prohibited for a passenger service vehicle
Structure	Vehicle structure condition, including any modifications that affect performance of frontal impact occupant protection	Additional mandatory equipment requirements, more detailed structure and modification checks (that affect stability)
Vehicle exterior	External projections condition and performance. Dimension requirements.	
Exhaust	Exhaust system condition and performance, and exhaust emissions performance (visible smoke)	
Vision – windscreen, wipers and mirrors	Glazing, sun visor, windscreen wash and wiper, and rear-view mirror requirements, condition and performance	Passenger service vehicle driver vision (including demister) condition and performance
Entrance and exit	Door and hinged panel retention system condition and performance	Additional passenger service vehicle door, step, ramp, hoist and emergency exit requirements, condition and performance
Vehicle interior	Seat, seatbelt, anchorage, head restraint, airbag, interior modification, speedometer and horn requirements, condition and performance	Additional passenger service vehicle seat (including wheelchair), aisle, heating and ventilation, fire protection, signage and emergency signal requirements, condition and performance
Towing connections	Towbar, towbar mounting or fifth wheel requirements and condition	Additional passenger service vehicle requirement for evidence of towbar rating or certification
Miscellaneous	Engine and transmission mounting, fuel system, LPG/CNG and electric/hybrid electrical system requirements and condition	Additional electric wiring requirements and condition

Proposed inspection scope changes

We propose retaining the current WoF and CoF A inspection scopes, but adding a requirement to both to require any Advanced Driver Assistance Systems fitted to a vehicle to be functioning. We believe this is a low-cost way to ensure critical safety systems are functioning, and aligns with international trends. For more detail see Annex 1 of the interim RIS.

Under this proposal, any vehicle with a system capable of assisting or controlling movement or operation (fully or partially) of a vehicle must not display a warning or fault indicator for the system at the time of WoF or CoF A inspection. A warning or fault indicator would include any visual, audible, or electronic alert designed to indicate something isn't working properly.

Including Advanced Driver Assistance System checks in CoF A will ensure both WoF and CoF A can cover the same safety critical vehicle features at inspection time.

What impacts could these proposed changes have?

Our summary of the key criteria assessment is provided in Table 7 below. For WoF and CoF A, this change is likely to introduce little additional inspection cost but may deliver additional safety outcomes and is likely to outweigh any compliance costs. There is also a benefit to maintaining alignment between inspection WoF and CoF A inspection scopes.

Table 7: Key criteria assessment for proposed WoF and CoF A scope changes

Criteria	Assessment
Improves safety outcomes	Likely to improve safety outcomes by ensuring critical safety systems are functioning as intended.
Reduces Compliance Cost	May slightly increase inspection costs for vehicles with Advanced Driver Assistance Systems, but these are expected to be low and limited to vehicles already equipped with such systems.
Ease of implementation	Relatively straightforward to implement using existing inspection and at low cost.
Delivers fair and equitable social outcomes	Applies only to vehicles with Advanced Driver Assistance Systems, typically newer and owned by higher-income groups. The requirement is proportionate to the safety benefit.

Note: A separate consultation is underway about potentially mandating certain Advanced Driver Assistance System safety features for vehicles entering New Zealand. If you'd like to provide feedback on this topic, visit the Consultation Hub.

Other options we considered

We considered creating a two-level inspection system for WoF:

1. **A quick visual check every 12 months for vehicles not requiring annual inspections:** Vehicles aged 4-10 years old would require inspections every two years, with this visual check occurring in the 'year between' mandated full inspections.
2. **A more detailed inspection for older/more travelled vehicles:** For example, those over 15 years old or with odometer readings of over 200,000 km.

After reviewing the possible costs and complexity of these multi-tier systems, we found any extra safety benefits wouldn't be enough to justify the changes. We also looked at switching rental vehicles, or all CoF A vehicles, to the WoF system. This could make sense for newer rentals, especially with the proposed move to annual inspections. But it could increase safety risks for older vehicles and reduce inspection detail. For generally older CoF A vehicles like taxis and rideshare light vehicles, which may not be maintained as regularly, we think it's important to keep the stricter CoF A requirements in place.

Enforcement and education

To strike a better balance between vehicle inspection system user costs and safety outcomes, we propose decreasing inspection frequency for just under a third of New Zealand's light vehicles. Any change to vehicle inspection frequency should be accompanied with efforts to maintain good vehicle-related road safety outcomes. Enabling and incentivising people to take more personal responsibility for the safety condition of their vehicle is always important, but arguably more so if vehicle inspection frequency reduces.

To this end we looked at 7 different enforcement and education options. A detailed analysis of each of these, including the reasons some of them were discounted, is available in the interim RIS.

The rest of this section focuses on the cases for change and the rationale for our proposals relating to enforcement and education.

Why should we change?

Enforcement, or the possibility of enforcement, is often an important part of encouraging compliance with any legal requirement. Vehicle condition is no exception to this. The possibility of a negative interaction or fine from enforcement agents, such as parking wardens or Police, can help motivate people to ensure they are abiding by the law.

Importantly, drivers and people with vehicles registered in their names have always been legally responsible, and liable, for ensuring their vehicles are in a safe condition. This includes being subject to infringements for operating or allowing the operation of an unsafe vehicle. As inspection frequency changes, this responsibility will need to become a more conscious and active part of being responsible for a vehicle.

The current level of education and public information provided by NZTA and other organisations likely reflects the relatively high level of trust people have in regular vehicle inspections. Should the package presented in this document lead to changes in vehicle inspection frequency, people will need to take more conscious and regular steps to personally maintain vehicle safety. This is likely to mean more education and public information about the importance of vehicle safety and self-checking. The government can enable this by providing 'how-tos' so people better understand what to do and what could happen if they don't.

What can we learn from other countries?

New Zealand's penalties and fines for vehicles with safety defects are relatively low when compared to other jurisdictions. The current fine for driving a vehicle with an invalid/expired WoF or CoF A is $200. Vehicle condition offences (such as bald tyres) currently carry a $150 fine. All Australian States have higher fine settings although this is at least partly because regular inspections are not required. The lowest fines are applied in Western Australia where they are up to NZ$560.

Countries with similar inspection frequency settings to those we are proposing, such as Japan, Sweden and Norway, all have higher penalties for non-compliance. Other countries with similar inspection frequencies to our proposals, but lower fines, like Ireland and Germany, have an average vehicle age of less than 10 years – compared to our average age of 15 years.

For further information on inspection settings in other countries see Annex 1 of the interim RIS.

Proposed changes

We're proposing changes to enforcement and education because they should work together to reduce any potential negative effects of changes to inspection frequency. While these proposals will need to be refined further, our initial assessment is they could deliver safety benefits beyond their direct cost.

For enforcement we propose further work be carried out on the following:

- Increasing compliance by working with local councils to improve vehicle safety compliance activity.
- Consider raising current fines and/or introducing demerit points for driving or parking a vehicle without a valid WoF/CoF A and/or other vehicle condition offences (such as bald tyres).

For education we are proposing:

- Change promotion – Information to help people understand any change we make (e.g. inspection frequency, scope, enforcement).
- Education – More prominent, frequent public information material about how best to check for and maintain safe vehicle condition (e.g. tyre tread depth, wipers, safety belts etc.).

What impacts could these proposed changes have?

Our key criteria assessment is summarised in Table 8 below. The potential safety benefits from higher fines and/or demerits are high. They would outweigh both the small additional cost to government and the heavier fines people may need to pay if they don't follow the rules. These changes should enable people to take more personal responsibility for the condition of their vehicles.

Table 8: Summary assessment against key criteria for compliance and education scope changes

Criteria	Assessment
Improves safety outcomes	Likely to improve safety outcomes by enabling and encouraging people to take greater responsibility for checking their vehicle's condition.
Reduces compliance cost	No increase in costs for vehicle owners unless they have to pay higher penalties for infringements.
Ease of implementation	Some additional cost is possible to develop more public information material however this might be covered by reprioritisation.
Delivers fair and equitable social outcomes	Could be some negative impact on people earning lower incomes if fines are increased. They are more likely to have older vehicles that are in poor condition and potentially incur increased fines.

Other options we considered

We also considered other levers to encourage compliance and mitigate risks associated with the proposals in this document. We considered introducing proactive prompts for light vehicle drivers and operators, to encourage self-checks of core vehicle features (for example, reminders to replace tyres based on a low, but not below-threshold, tyre tread measurement). However, the Information Technology upgrades to underpin such a measure are still in development and may not be ready in the short-term.

We considered other options for increasing compliance and improving safety outcomes, including improved IT systems and working with industry, but have focused on progressing changes we consider will have the highest chance of improving outcomes in the short-to-medium-term.

Making a submission

When you send your feedback, make sure to include:

- Title of the discussion document you're commenting on (if providing feedback by email)
- Your name (and job title, if relevant)
- Your organisation's name (if relevant)
- Your email address (preferred) or postal address

You can send us your feedback in 2 ways:

1. Complete the online form here: Considering changes to light vehicle inspections
   or
2. by email: rules@nzta.govt.nz.

Consultation closes on Wednesday 17 December 2025

All feedback will be considered before a decision is made by the Associate Minister.

Your submission is public information

Please note your submission might be made public. We may publish your submission and may include your name as the person who submitted it or provide it to a third party.

If any part of your submission is commercially sensitive or you have a reason why it shouldn't be disclosed, or why you shouldn't be named, please make that clear in your submission.

Any requests to keep information private will be considered under the *Official Information Act 1982*.

Process for making Rule changes

The *Land Transport Act* (the Act) *1998* provides the legal framework for making Land Transport Rules (Rules). Section 161 of the Act outlines how Ministers of Transport (Ministers) must make Rules.

What are Rules?

Rules are laws made under the Act by Ministers.

- **Purpose**: To apply transport policy in practice, covering safety, access, mobility, public health, the environment, and economic growth.
- **Who is responsible**: NZTA drafts Rules with the Ministry, generally runs public consultations on behalf of Ministers, analyses the feedback and finalises them for Ministers to sign.

Following Rules is required, because they are part of New Zealand transport law. Any offences and penalties related to a Rule are in the Act or in Regulations.

Key considerations for rule making

Ministers must consider:

- Safety risks and infrastructure impact
- Costs and international obligations
- Benefits to economy, access, health, and sustainability

Rules are easy to access and available to the public.

All current Rules are available online at:
https://nzta.govt.nz/rules/

You can also learn more about Rules and how they are made at:
https://nzta.govt.nz/resources/rules/about

Register your interest to receive Land Transport Rule updates at:
https://nzta.govt.nz/registration-of-interest-in-land-transport-rules/

Appendix 1: Questions

The questions below are the same as those in our online form, reproduced here for completeness. We recommend using the online form when submitting.

We'd like to hear your thoughts on the proposed changes in this discussion document. Whether you're a driver, vehicle owner, mechanic, or business operator, we want to hear from you.

For each question asked, please provide information/examples about why you do/don't support an idea, and feel free to provide us with any other suggestions, and supporting information.

General questions

1. **Do you think these changes could improve the overall efficiency and effectiveness of the vehicle inspection system?**
   ☐ Yes
   ☐ No
   Why?
2. **Do you support the general direction of the proposed changes to light vehicle inspections?** ***(Select all that apply)***
   ☐ Reducing inspection frequency for lower-risk vehicles
   ☐ Updating inspection scope to include modern safety features
   ☐ Increasing enforcement of vehicle condition compliance
   ☐ Providing more education and tools to help people maintain safe vehicles
   ☐ None of the above
   Why?

Part 1: Inspection frequency

3. **Should the second WoF for new vehicles move to 4 years from the current 3 years?**
   ☐ Yes
   ☐ No — we should retain the current setting (3 years)
   ☐ No — it should be extended to 5 years
   Why?
4. **Should WoF for vehicles aged 4-10 years be every two years and over 10 years be annual?**
   ☐ Yes
   ☐ No – we should retain the current settings (6-monthly for vehicles first registered before 1 January 2000 and annual for all other vehicles older than 3 years)
   ☐ Yes – but two-yearly inspection should be extended to include vehicles up to age X (for example 15)
   Why?
5. **Do you support changing CoF A inspections for rental vehicles under 5 years old from 6-monthly to annual?**
   ☐ Yes
   ☐ No – we should retain the current setting (default 6-monthly inspection)
   ☐ No – it should be for all rental vehicles regardless of age
   ☐ No – all rental vehicles should be subject to WoF instead of CoF A
   Why?
6. **If WoF or CoF A inspection frequencies are reduced, what impact would this have on you or your organisation?**
   ☐ Positive
   ☐ Negative

☐ No impact

Why?

Part 2: Inspection scope

7. **Do you support adding checks for Advanced Driver Assistance Systems to WoF and CoF A inspections?**

   ☐ Yes

   ☐ No

   Why?

8. **Which Advanced Driver Assistance Systems features do you think should be included in WoF and CoF A inspections (choose all that apply)?**

   ☐ Automatic Emergency Braking (AEB)

   ☐ Lane Keep Support (LKS)

   ☐ Blind Spot Monitoring

   ☐ Acoustic Vehicle Alert System

   ☐ None

   Why?

9. **Are there any other vehicle systems or features you think should be added to or removed from WoF and CoF A inspections?**

   Please explain your answer.

Part 3: Enforcement and education

10. **Do you support increasing enforcement of vehicle condition compliance by local councils?**

    ☐ Yes

    ☐ No

    Why?

11. **Do you support increasing fines or introducing demerit points for expired WoF/CoF A or unsafe vehicle conditions (such as bald tyres)?**

    ☐ Yes

    ☐ No

    Why?

12. **What's the best way to help people regularly check their vehicle's safety between inspections?**

    ☐ Public information and education campaigns

    ☐ Online tools or apps

    ☐ Reminders via email or text

    ☐ Mechanic-led education

    Why?

13. **Do you think people would respond positively to more vehicle condition education and guidance?**

    ☐ Yes

    ☐ No

    Why?

14. **Are there other changes to the WoF and CoF A systems you think should be considered, and why?**

    Please explain your answer.